

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In re:	)	Case No. 15-41404-705
	)	Honorable Charles E. Rendlen, III
GREEN JACOBSON, P.C.,	)	Chapter 7
	)	
Debtor.	)	
_____	)	

**MOTION TO AUTHORIZE RESPONSIBLE PARTY TO  
REVIEW AND FILE FORM 5500**

COMES NOW David A. Sosne (“Trustee”), the duly appointed and qualified Chapter 7 Trustee for the bankruptcy estate of Green Jacobson, P.C. (the “Debtor”), by and through his undersigned counsel, and for his Motion states as follows:

1. Prior to the filing of the above-captioned bankruptcy proceeding, Debtor was the Plan Administrator of a 401(k) Plan offered to its employees.

2. Though the 401(k) Plan was terminated prior to the filing of Debtor’s bankruptcy, Debtor is required to file a Form 5500 and, potentially other related forms, for 2014 (collectively, “Form 5500”) with federal and/or state taxing authorities.

3. Trustee has been notified that the Form 5500 was prepared by Principal Financial, as has been done in all years prior to 2014 in which the 401(k) Plan was in effect, and that the form must be filed on or before July 31, 2015.

4. Trustee has no independent knowledge of the facts or information contained in the Form 5500 and, therefore, cannot attest to the accuracy of the information. However, Trustee believes that Deborah Mann, one of two Court-appointed responsible parties for the Debtor, has sufficient knowledge to review and file the Form 5500, as she has done so on multiple past occasions, and seeks an order from this Court authorizing Ms. Mann to review and file the Form

5500, as defined above, as well as take such other acts as may be necessary to complete the review and filing process.

5. Since time is of the essence and the relief sought herein does not materially impact any party in interest (as it is solely an administrative matter) other than Ms. Mann, the Trustee requests (i) that service of this Motion be limited to the parties named on the attached Certificate of Service and all parties receiving electronic notice in this case and (ii) that this Motion be granted without hearing, unless an objection is filed on or before July 15, 2015.

6. To the best knowledge and belief of the Trustee, Ms. Mann consents to this Motion and the relief requested herein.

WHEREFORE, Trustee prays this Honorable Court make and enter its Order (i) authorizing Deborah Mann, one of Debtor's Court-appointed responsible parties, to review and file the Form 5500, as defined above, as well as to take such other acts as may be necessary to complete the review and filing process; (ii) limiting service/notice of this Motion to the parties named on the attached Certificate of Service and all parties receiving electronic notice in this case; (iii) granting this Motion without hearing, unless an objection is filed on or before July 15, 2015; and (iv) granting such other and further relief as may be necessary.

Respectfully Submitted,  
SUMMERS COMPTON WELLS LLC

Date: July 7, 2015

By: /s/ Brian J. LaFlamme  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via electronic filing in the CM/ECF system of the United States Bankruptcy Court for the Eastern District of Missouri to the parties requesting service by electronic filing. I hereby also certify that a copy of the foregoing was served via United States Mail, first class postage prepaid, on the date of the electronic filing of this document to those individuals and entities not requesting service by electronic filing. The individuals and entities being served electronically or by mail are:

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Date: July 7, 2015

/s/ Marquita Monroe